

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION**

EARL PARRIS, JR., Individually, and
on Behalf of a Class of Persons
Similarly Situated,

Plaintiff,

City of SUMMERVILLE, GEORGIA,

Intervenor Plaintiff,

v.

3M COMPANY, *et al.*

Defendants.

Case No.: 4:21-cv-00040-TWT

JOINT NOTICE OF LODGING OF PROPOSED CONSENT DECREE

Plaintiff Earl Parris, Jr. and Defendants Mount Vernon Mills, Inc. and the Town of Trion, Georgia (collectively “the Parties”) hereby notify the Court that they are lodging the proposed Consent Decree filed herewith for the purpose of providing notice of the proposed settlement of this matter to the Attorney General of the United States (“Attorney General”) and the Administrator of the United States Environmental Protection Agency (“Administrator”) as required by Section 505(c)(3) of the federal Clean Water Act (“CWA”), 33 U.S.C. § 1365(c)(3). A copy of the proposed Consent Decree was sent to the Department of Justice, Citizen Suit Coordinator, via email, on July 24, 2025. A copy was also sent to the Administrator

via certified mail, return receipt requested, on July 24, 2025. Pursuant to 40 C.F.R. § 135.3, the Parties will notify the Court of the dates of service of the proposed Consent Decree on the Attorney General and the Administrator.

The attached proposed Consent Decree has been signed by the Parties and will, pursuant to its terms, fully resolve this litigation as to the Parties upon entry by the Court. The Parties are authorized to state that though the City of Summerville has asserted no claims against Mount Vernon Mills, Inc., and the Town of Trion, Georgia, as intervenors in this litigation, Summerville supports entry of the lodged Consent Decree and will receive benefits from its adoption by the Court.

The Parties respectfully request that the Court not sign the proposed Consent Decree at this time. Instead, the Consent Decree should remain lodged until after the statutory 45-day period for review by the Administrator and the Attorney General has passed, or until the Attorney General informs the Parties or the Court that it has completed its review. At such time, if the Court finds the Consent Decree to be fair, reasonable, and in the public interest, the Parties respectfully request that the Court enter it as expeditiously as possible.

Respectfully submitted.

/s/Gary A. Davis

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CERTIFICATE OF COMPLIANCE

Pursuant to Northern District of Georgia Civil Local Rule 7.1.D., the undersigned counsel certifies that the foregoing filing is prepared in Times New Roman 14-point font, as mandated in Local Rule 5.1.C.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing **JOINT NOTICE OF LODGING OF PROPOSED CONSENT DECREE** has been filed electronically with the Clerk of Court by using the CM/ECF system which will automatically email all counsel of record.

This the 24th day of July, 2025.

/s Gary A. Davis